UNITED STATES DISTRICT COURT FOR THE DISTRICT OF VERMONT

UNITED STATES OF AMERICA,)
)
)
V.) Docket No. 22-MJ-11
)
DEYQUAN MARTIN, a.k.a. "nut,"	
Defendant.)

MOTION FOR DETENTION

The United States of America, by and through its attorney, Nikolas P. Kerest, United States Attorney for the District of Vermont, moves for pretrial detention of the above-named defendant pursuant to 18 U.S.C. § 3142(e) and (f).

- 1. <u>Eligibility for Detention</u>. This defendant is eligible for detention because the case involves a felony offense involving a minor victim. *See* 18 U.S.C. § 3142(f)(1)(E).
- 2. <u>Reason For Detention</u>. The Court should detain the defendant because there are no conditions of release which will reasonably assure the safety of any other person and the community as well as the defendant's appearance as required.
- 3. <u>Rebuttable Presumption</u>. The United States will not invoke the rebuttable presumption against defendant under § 3142(e) at this time.
- 4. <u>Time For Detention Hearing</u>. The United States requests the court conduct the detention hearing upon completion of the pretrial services report and after a three-day continuance authorized by 18 U.S.C. § 3142(f).

Dated at Burlington, in the District of Vermont, September 23, 2022.

Respectfully submitted,

NIKOLAS P. KEREST United States Attorney

By: /s/ Andrew C. Gilman

Andrew C. Gilman
Assistant U.S. Attorney

P.O. Box 570

Burlington, VT 05402-0570

(802) 951-6725

Andrew.Gilman2@usdoj.gov